

ANDERSON LAW
DAVID C. ANDERSON, State Bar # 83146
711 Van Ness Avenue, Suite 220
San Francisco, CA 94102
Telephone: (415) 395-9898
Facsimile: (415) 395-9839

Attorneys for Plaintiff
RHIANNIN SKEELS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RHIANNIN SKEELS,

Plaintiff,

v.

OFFICER KENDRICK PILEGAARD,
individually and in his capacity as a Novato
Police Department officer; CITY OF
NOVATO, CALIFORNIA; NOVATO POLICE
DEPARTMENT; VERONIQUE L. AU, M.D.;
SUTTER WESTBAY HOSPITALS d.b.a.
NOVATO COMMUNITY HOSPITAL;
COUNTY OF MARIN, CALIFORNIA;
MARIN COUNTY SHERIFF'S OFFICE; and
DOES 1-50, inclusive,

Defendants.

Case No. CV 12-2175 THE
Assigned to Judge Thelton E. Henderson

**STIPULATION OF PARTIES TO
EXTEND DISCOVERY DEADLINE**

Plaintiff RHIANNIN SKEELS and Defendants CITY OF NOVATO, NOVATO POLICE DEPT.,
CHIEF J. KREINS, OFF. K. PILEGAARD, by and through their designated counsel, hereby submit their
Stipulation to Extend Discovery and agree to extend the discovery deadline, currently set for June 30,
2014, up to and including July 14, 2014 to permit time to complete two discovery matters, as follows:

1. Plaintiff to provide answers to written discovery; and
2. Defense Psychiatric Examination of Plaintiff.

1 Good cause exists for the requested stipulation because plaintiff resides outside the State of
2 California and works full time, making it difficult for plaintiff's counsel to meet with her during business
3 hours and making it difficult to schedule a Defense Psychiatric Examination.

4 Counsel have met and conferred extensively and are cooperating to complete these two remaining
5 discovery items.

6 This requested extension of time will not affect any scheduled court dates or deadlines.

7 **IT IS SO STIPULATED AND AGREED.**

8 Dated: June 24, 2014

ANDERSON LAW

9 By: /s/ David C. Anderson
10 David C. Anderson
11 Counsel for Plaintiff
RHIANNIN SKEELS

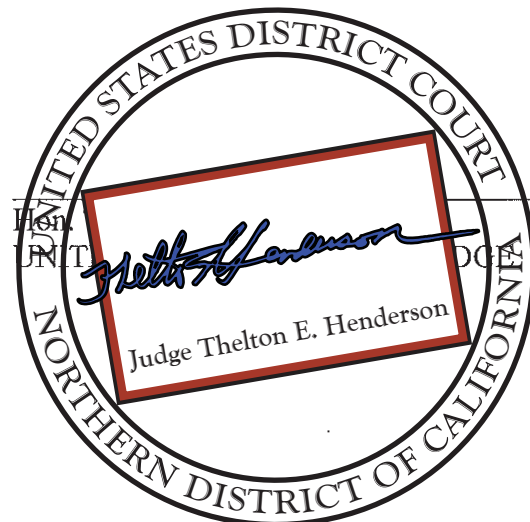
12 Dated: June 24, 2014

BERTRAND, FOX & ELLIOT

13 By: /s/ Richard W. Osman
14 Richard W. Osman
15 Counsel for Defendants
16 CITY OF NOVATO,
NOVATO POLICE DEPARTMENT
and OFFICER KENDRICK PILEGAARD

17 **IT IS SO ORDERED:**

18
19 Dated: 06/24/2014



1 **Skeels v. Pilgaard, et al.**

2 **U.S. DISTRICT COURT NO. CV 12-02175 TEH**

3 **PROOF OF SERVICE BY MAIL**

4 **STATE OF CALIFORNIA, U.S. DISTRICT COURT**

5 I, the undersigned, declare as follows:

6 I am over 18 years of age and not a party to the within action; my business address is 711 Van Ness Avenue, Suite 220, San Francisco, CA 94102; I am employed in San Francisco County, California.

7 I am readily familiar with my employer's practices for collection and processing of correspondence for mailing with the United States Postal Service.

8 On the below date, I served a copy of the following document(s):

9 **STIPULATION OF PARTIES TO EXTEND DISCOVERY DEADLINE**

10 on the interested parties in the above-referenced case by following ordinary business practices and placing for collection and mailing a true copy of the above-referenced document(s), enclosed in sealed envelope(s); in the ordinary course of business, the above document(s) would have been deposited for first-class delivery with the United States Postal Service the same day they were placed for deposit, with postage thereon fully prepaid,

11 The foregoing was/were addressed as follows:

12 Thomas F. Bertrand, Esq.
13 Richard Osman, Esq., ext.
14 Bertrand, Fox & Elliot
15 The Waterfront Building
16 2749 Hyde Street
17 San Francisco, CA 94109
18 353-0999
19 353-0990 fax
20 Atty. For Def. City of Novato, Novato
21 Police Dept., Chief J. Kreins, Off. K.
22 Pilegaard

23 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 24, 2014.

24 /s/ Cynthia Sparks
25 CYNTHIA SPARKS

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